

The Honorable Robert S. Lasnik
United States District Court Judge

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHAEL MOI, an individual,

Plaintiff,

v.

CHIHULY STUDIO, INC., a Washington
corporation; DALE CHIHULY, individually
and as a married person; LESLIE
CHIHULY, individually and as a married
person,

Defendants.

NO. 2:17-cv-00853

**PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION TO FILE
DOCUMENT UNDER SEAL
(COMPLAINT)**

Defendants' request to file a redacted copy of Plaintiff's complaint is moot. Plaintiff served Defendants with a complaint and summons on May 15, 2017. Defendants filed an unredacted version of Plaintiff's complaint in the King County Superior Court on June 2, 2017, and removed the case to this Court the same day. The complaint¹ filed in King County Superior Court was never sealed or redacted and was disseminated by numerous media outlets. To date, it still sits unsealed in superior court. Consequently, Defendants' request is moot. Moreover, Defendants failed to meet and confer with plaintiff counsel before filing pursuant to 5(g)(3)(A). Not until after filing the

¹ It currently exists online at <https://www.documentcloud.org/documents/3766463-Moi-v-Chihuly.html>.
{00278909;2}

1 motion did defense counsel reach out to plaintiff counsel to discuss the need to seal or redact the
2 document.

3 DATED this 12th day of June, 2017, at Seattle, Washington.

4 **FREY BUCK, P.S.**

5 s/ Anne Bremner
6 Anne Bremner, WSBA #13269
7 *Attorney for Plaintiff*
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PLAINTIFF'S RESPONSE TO DEFENDANTS'
MOTION TO FILE DOCUMENT UNDER SEAL
(COMPLAINT) - 2

FREYBUCK P.S.
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Certificate of Service

The undersigned certifies under the penalty of perjury according to the laws of the United States and the State of Washington that on this date I caused to be served in the manner noted below **PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO FILE DOCUMENT UNDER SEAL (COMPLAINT)** on the following individuals:

Susan Foster
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Attorneys for Defendants

☐ Via Legal Messenger
☐ Via US Mail
☒ Via Email
☒ Via ECF

DATED this 12th day of June, 2017, at Seattle, Washington.

s/ Lia Maria Fulgaro

Lia Maria Fulgaro
Paralegal

{00278909;2}

PLAINTIFF'S RESPONSE TO DEFENDANTS'
MOTION TO FILE DOCUMENT UNDER SEAL
(COMPLAINT) - 3

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